

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN - SOUTHERN DIVISION

SARAH,

Plaintiff,

v.

Google LLC, YouTube LLC, James JACKSON,  
also known online as “ONISION,” and LUCAS  
JACKSON, formerly known online as  
“LAINEYBOT,” “LAINEY” and “KAI,”

Defendants.

Case No. 1:23-cv-00223-HYJ-SJB

Hon. Hala Y. Jarbou  
Mag. Judge Sally J. Berens

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**CERTIFICATE OF CONCURRENCE**  
**GOOGLE LLC AND YOUTUBE, LLC’S MOTION TO DISMISS**

I, Benjamin Margo, hereby attest and certify that pursuant to the requirements of Local Rule 7.1(d) counsel for Defendants Google LLC and YouTube LLC met and conferred with Plaintiff’s counsel Lisa Haba and Margaret Mabie in an attempt to resolve the aforementioned pleading deficiencies raised in the Motion to Dismiss. Counsel for Google and YouTube and counsel for Plaintiff exchanged multiple phone calls and emails regarding the issues raised in Motion to Dismiss on May 4 and May 17. On May 17, 2023, Counsel for Google and YouTube expressly asked Plaintiff’s counsel for concurrence to the Motion to Dismiss over email.

Plaintiff’s counsel expressed that they would not concur with the Motion to Dismiss.

Respectfully submitted,

**Clark Hill PLC**

By: /s/ Christopher M. Trebilcock  
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DATE: May 19, 2023

Respectfully submitted,

/s/ Brian M. Willen

**Wilson Sonsini Goodrich & Rosati  
Professional Corporation**

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*Attorneys for Defendants GOOGLE LLC  
and YOUTUBE LLC*

DATE: May 19, 2023

**CERTIFICATE OF SERVICE**

I hereby certify that on May 19, 2023, I caused the foregoing paper to be electronically filed with the Clerk of Court using the ECF system, which will send notification to counsel of record.

By: Christopher M. Trebilcock  
Christopher M. Trebilcock